



MINNESOTA CHAUFFEURED TRANSPORTATION ASSOCIATION

The Minnesota Chauffeured Transportation Association serves as the voice of small business owners who are dedicated to the success of chauffeured transportation and improving industry laws.

December 2, 2014

The Honorable Kathy Lantry, Council President, City of Saint Paul
and
Members, Saint Paul City Council
15 Kellogg Blvd., West
Saint Paul, MN 55102

Re: Ordinance 14-39; Chapter 373 – Transportation Network Companies

Dear Council President Lantry and Council Members:

The Minnesota Chauffeured Transportation Association (MCTA) serves as the voice of small business owners who are dedicated to the success of chauffeured transportation in Minnesota. Please consider this correspondence MCTA's official position regarding the proposed Transportation Network Companies (TNC) ordinance.

Chauffeured vehicles such as limousines, town cars, and chauffeured SUV's are part of Minnesota's public for-hire transportation industry, and are regulated by the Minnesota Department of Transportation and U.S. Department of Transportation. Our member businesses provide services statewide and service clients in St. Paul.

The proposed TNC ordinance will negatively affect Minnesota's chauffeured transportation industry and the public. Allowing separate and reduced regulations crafted for a select few companies creates an uneven and unfair marketplace, raises legitimate public safety concerns, and lowers the high standard of excellence for service, insurance, and quality our industry works hard to maintain.

1. To operate for-hire transportation in Minnesota, MCTA believes every company should be allowed to compete and be regulated in a uniform way, on a level playing field. Policymakers have set minimum standards for insurance, inspections, and other regulations to keep industry consumers, drivers, and the public safe. These same existing standards should apply for these newer public for-hire transportation companies. Under the proposed ordinance, the city is potentially creating an unfair business environment and an uneven playing field with special rules for a few special companies at the misfortune of many long-time local companies that abide—and will continue to do so—by existing regulations with higher regulations, fees, etc.

2. The insurance requirement called for in the TNC ordinance should mirror what was recently passed by the Minnesota Legislature, nearly unanimously, which Governor Mark Dayton signed into law that maintains the high standards of the chauffeured transportation industry and sets the minimum level of insurance required by for-hire transportation at \$1.5 million, effective starting July 1, 2014. State policymakers agreed that this level of insurance is necessary and important. This \$1.5 million minimum is also the current U.S. DOT standard minimum requirement, as well as the Metropolitan Airport Commissions minimum requirement.



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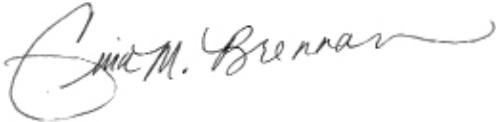
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Minnesota Chauffeured
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3. Minnesota's chauffeured transportation industry prides itself on providing high quality, dependable service. The reputation of our industry is tied to other public for-hire transportation categories and we are genuinely concerned about lowering of quality and service through the TNC ordinance.

Competition and innovation in the marketplace is good. However, special rules for a select few offer unfair advantages and smaller insurance regulations are unsafe. The new proposed TNC rules negatively affect the existing high standards our industry works hard to maintain. We have genuine concern about the future of chauffeured and for-hire transportation and wish to be a part of a solution for the city of St. Paul and our state moving forward.

Thank you for your consideration.

Sincerely,



Gina Brennan
President
President & CEO, Corporate Car & Coach



Charlie Murray
Vice President
COO, Total Luxury Limousine



Len Nelson
Secretary/ Treasurer
Owner, Valley Limousine and Coach